

Mr. George P. Lord
General Electric Company
One Lexan Lane
Mt. Vernon, Indiana 47620

Re: Significant Source Modification No:
129-10709-00002

Dear Mr. Lord:

General Electric Company applied for a Part 70 operating permit on October 6, 1996 for a plastic manufacturing plant. An application to modify the source was received on March 2, 1999. Pursuant to 326 IAC 2-7-10.5, the following emission units are approved for construction at the source:

One (1) plastic sheet coating line, identified as L-16, consisting of one (1) roll coater and one (1) electric cure oven, exhausting through three (3) stack IDs 09-001, 09-002 and 09-106. The volatile organic compounds (VOC) emissions from the plastic sheet coating line will be controlled by four (4) existing boilers (Reiley boiler, Lasker boiler, Erie boiler and B & W boiler).

The proposed Significant Source Modification approval will be incorporated into the pending Part 70 permit application pursuant to 326 IAC 2-7-10.5(l)(3). If there are no changes to the proposed construction of the emission units, the source may begin operating on the date that IDEM receives an affidavit of construction pursuant to 326 IAC 2-7-10.5(h). If there are any changes to the proposed construction the source can not operate until an Operation Permit Validation Letter is issued.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter contact Scott Pan, c/o OAM, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call (800) 451-6027, press 0 and ask for Duane Van Laningham or extension (3-6878), or dial (973) 575-2555, extension 3248.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

Attachments
SCP/EVP

cc: File - Posey County
U.S. EPA, Region V
Air Compliance Section Inspector Dave Holder
Compliance Data Section - Jerri Curless
Administrative and Development - Janet Mobley
Technical Support and Modeling - Nancy Landau

PART 70 SIGNIFICANT SOURCE MODIFICATION OFFICE OF AIR MANAGEMENT

**General Electric Company
One Lexan Lane
Mt. Vernon, Indiana 47620**

(herein known as the Permittee) is hereby authorized to construct, modify and operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this approval.

This approval is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Significant Source Modification No.: 129-10709-00002	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

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SECTION A

SOURCE SUMMARY

This approval is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the emission units contained in conditions A.1 through A.2 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this approval pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary plastic manufacturing source.

Source Address:	One Lexan Lane, Mt. Vernon, IN 47620
Mailing Address:	One Lexan Lane, Mt. Vernon, IN 47620
Phone Number:	(812) 831-7000
SIC Code:	2821
County Location:	Posey
County Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program
	Major Source, under PSD Rules;
	Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source is approved to construct, modify and operate the following emission units and pollution control devices:

One (1) plastic sheet coating line, identified as L-16, consisting of one (1) roll coater and one (1) electric cure oven, exhausting through three (3) stack IDs 09-001, 09-002 and 09-106. The volatile organic compounds (VOC) emissions from the plastic sheet coating line will be controlled by four (4) existing boilers (Riley boiler (S/V 09-106), Lasker boiler (S/V 09-002), Erie boiler (S/V 09-002) and B & W boiler (S/V 09-001)).

Currently, the Riley and Erie boilers are used to control VOC emissions from emission units in the building where L-16 will be located. Piping will be added to allow the VOC emissions from L-16 to be controlled by the Erie and Riley boilers. As part of this modification, piping will be added to allow the VOC emissions from L-16 and other emission units in the same building to be also controlled by the Lasker and B & W boilers.

General Electric Company requested that the coating material used and the raw material usage rates be maintained as confidential information.

A.3 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONSTRUCTION CONDITIONS

B.1 Permit No Defense [IC 13]

This approval to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

B.2 Definitions [326 IAC 2-7-1]

Terms in this approval shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2 and 326 IAC 2-7 shall prevail.

B.3 Effective Date of the Permit [IC13-15-5-3]

Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.

B.4 Revocation of Permits [326 IAC 2-1.1-9(5)][326 IAC 2-7-10.5(i)]

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

B.5 Significant Source Modification [326 IAC 2-7-10.5(h)]

This document shall also become the approval to operate pursuant to 326 IAC 2-7-10.5(h) when, prior to start of operation, the following requirements are met:

- (a) The attached affidavit of construction shall be submitted to the Office of Air Management (OAM), Permit Administration & Development Section, verifying that the emission units were constructed as proposed in the application. The emissions units covered in the Significant Source Modification approval may begin operating on the date the affidavit of construction is postmarked or hand delivered to IDEM if constructed as proposed.
- (b) If actual construction of the emissions units differs from the construction proposed in the application, the source may not begin operation until the source modification has been revised pursuant to 326 IAC 2-7-11 or 326 IAC 2-7-12 and an Operation Permit Validation Letter is issued.
- (c) If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.
- (d) The Permittee shall receive an Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section and attach it to this document.

However, in the event that the Title V application is being processed at the same time as this application, the following additional procedures shall be followed for obtaining the right to operate:

- (1) If the Title V draft permit has not gone on public notice, then the change/addition covered by the Significant Source Modification (SSM) will be included in the Title V draft.
- (2) If the Title V permit has gone thru final EPA proposal and would be issued ahead of the SSM, then the SSM will go thru a concurrent 45 day EPA review. Then the SSM will be incorporated into the final Title V permit at the time of issuance.

- (3) If the Title V permit has not gone thru final EPA review and would be issued after the SSM is issued, then the SSM would be added to the proposed Title V permit, and the Title V permit will be issued after EPA review.

SECTION C GENERAL OPERATION CONDITIONS

C.1 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)]

- (a) Where specifically designated by this approval or required by an applicable requirement, any application form, report, or compliance certification submitted under this approval shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this approval, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, on the attached Certification Form or a form substantially similar to it, with each submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

C.2 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this approval, the Permittee shall prepare and maintain a Preventive Maintenance Plan (PMP) within ninety (90) days after issuance of this approval, including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM.

C.3 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this approval.
- (b) Any application requesting an amendment or modification of this approval shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

C.4 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this approval:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.

C.5 Operation of Equipment [326 IAC 2-7-6(6)]

All air pollution control equipment listed in this approval and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

Testing Requirements [326 IAC 2-7-6(1)]

C.6 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this approval, utilizing methods approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this approval, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.7 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Compliance with applicable requirements shall be documented as required by this approval. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, no more than ninety (90) days after receipt of this approval. If due to circumstances beyond its control, this schedule cannot be met, the Permittee may extend the compliance schedule an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.8 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5][326 IAC 2-7-6] [326 IAC 1-6]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
- (1) This condition;
 - (2) The Compliance Determination Requirements in Section D of this approval;
 - (3) The Compliance Monitoring Requirements in Section D of this approval;
 - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this approval; and
 - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this approval. CRP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM. The CRP shall be prepared within ninety (90) days after issuance of this approval by the Permittee and maintained on site, and is comprised of :
 - (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this approval; and

- (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this approval, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the approval unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
 - (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the approval conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the approval, and such request has not been denied or;
 - (3) An automatic measurement was taken when the process was not operating; or
 - (4) The process has already returned to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

C.9 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]
[326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this approval exceed the level specified in any condition of this approval, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate approval conditions may be grounds for immediate revocation of the approval to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.10 Malfunctions Report [326 IAC 1-6-2]

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAM, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.11 Annual Emission Statement [326 IAC 2-6]

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
 - (1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
 - (2) Indicate actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM on or before the date it is due.

The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

C.12 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]

- (a) With the exception of performance tests conducted in accordance with Section C-Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this approval shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this approval is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this approval.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.13 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
 - (1) The date, place, and time of sampling or measurements;
 - (2) The dates analyses were performed;
 - (3) The company or entity performing the analyses;

- (4) The analytic techniques or methods used;
 - (5) The results of such analyses; and
 - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
 - (1) Copies of all reports required by this approval;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;
 - (4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this approval, and whether a deviation from a approval condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of approval issuance.

C.14 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- (a) The reports required by conditions in Section D of this approval shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (b) Unless otherwise specified in this approval, any notice, report, or other submission required by this approval shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM on or before the date it is due.
- (c) Unless otherwise specified in this approval, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period. The reports do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) The first report shall cover the period commencing on the date of issuance of this approval and ending on the last day of the reporting period.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

One (1) plastic sheet coating line, identified as L-16, consisting of one (1) roll coater and one (1) electric cure oven, exhausting through three (3) stack IDs 09-001, 09-002 and 09-106. The volatile organic compounds (VOC) emissions from the plastic sheet coating line will be controlled by four (4) existing boilers (Riley boiler (S/V 09-106), Lasker boiler (S/V 09-002), Erie boiler (S/V 09-002) and B & W boiler (S/V 09-001)).

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6]

The operation of the plastic sheet coating line shall be in compliance with the requirements of 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) by limiting VOC emissions as follows:

- (a) Based on the maximum VOC usage rate, the input of VOC to the plastic sheet coating line shall be limited to less than 214.8 tons per twelve (12) consecutive month period. During the first twelve (12) months of operation, the input of VOC shall be limited such that the total usage divided by the accumulated months of operation shall be less than 17.9 tons per month.
- (b) The four (4) existing boilers (Riley boiler, Lasker boiler, Erie boiler and B & W boiler) operate at all times that the plastic sheet coating line is in operation and each boiler shall maintain a minimum temperature as described in Condition D.1.7 to maintain a minimum overall control efficiency of 95% including capture and removal efficiencies.

The conditions shall limit controlled VOC emissions to less than 10.7 tons per twelve (12) consecutive month period.

D.1.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section C - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

Compliance Determination Requirements

D.1.3 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC limit specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.4 Volatile Organic Compounds (VOC)

The boilers for the VOC control shall be in operation at all times when a VOC-containing coating is being applied or VOC -containing Solvent is being used in the Line 16 plastic sheet coating facility.

D.1.5 Volatile Organic Compounds (VOC)

Compliance with the VOC usage limitation contained in Conditions D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.6 VOC Emissions

Compliance with Condition D.1.1 shall be demonstrated within 30 days of the end of each month based on the VOC usage for the most recent twelve (12) month period.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.7 Parametric Monitoring

The Permittee shall record the combustion zone temperatures for the four (4) boilers (Riley boiler, Lasker boiler, Erie boiler and B & W boiler) controlling the VOC emissions, at least once daily when a VOC-containing coating is being applied or VOC-containing Solvent is being used in the Line 16 plastic sheet coating process. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the combustion zone temperature of each of the four (4) boilers controlling VOC emissions shall be maintained at a minimum of 1400°F, or at temperatures established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the temperature readings are outside of the above mentioned ranges for any one reading.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.8 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (6) below. Records of the information set forth in (1) through (6) shall be prepared monthly and shall be complete and sufficient to establish compliance with the VOC usage limit and/or the VOC emission limit established in Condition D.1.1.
 - (1) The amount and VOC content of each coating material and solvent used. Records may include purchase orders, invoices, and material safety data sheets (MSDS) and any other documents that can verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - (3) The VOC content (by weight) of the coatings used for each month;
 - (4) The cleanup solvent usage for each month;
 - (5) The VOC usage for each month; and
 - (6) The weight of VOCs emitted for each compliance period, assuming an overall control efficiency (capture and removal combined) of 95% or the overall control efficiency established during the latest stack test.
- (b) To document compliance with Condition D.1.7, the Permittee shall maintain records of the combustion zone temperatures of the four (4) boilers controlling VOC emissions. Records maintained shall be taken daily and shall be complete and sufficient to establish compliance with the VOC emission limit established in Condition D.1.1.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

**PART 70 SOURCE MODIFICATION
CERTIFICATION**

Source Name: General Electric Company
Source Address: One Lexan Lane, Mt. Vernon, IN 47620
Mailing Address: One Lexan Lane, Mt. Vernon, IN 47620
Source Modification No.: SSM 129-10709-00002

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this approval.

Please check what document is being certified:

- 9 Test Result (specify) _____
9 Report (specify) _____
9 Notification (specify) _____
9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

MALFUNCTION REPORT

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
FAX NUMBER - 317 233-5967**

**This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6
and to qualify for the exemption under 326 IAC 1-6-4.**

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ?_____, 25 TONS/YEAR SULFUR DIOXIDE ?_____, 25 TONS/YEAR NITROGEN OXIDES?_____, 25 TONS/YEAR VOC ?_____, 25 TONS/YEAR HYDROGEN SULFIDE ?_____, 25 TONS/YEAR TOTAL REDUCED SULFUR ?_____, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ?_____, 25 TONS/YEAR FLUORIDES ?_____, 100TONS/YEAR CARBON MONOXIDE ?_____, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ?_____, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ?_____, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ?_____, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ?_____. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION _____.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC _____ OR, PERMIT CONDITION # _____ AND/OR PERMIT LIMIT OF _____

THIS INCIDENT MEETS THE DEFINITION OF 'MALFUNCTION' AS LISTED ON REVERSE SIDE ? Y N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ? Y N

COMPANY: _____ General Electric Company _____ PHONE NO. (812) 831-7000
LOCATION: (CITY AND COUNTY) _____ Mt. Vernon, Posey County _____
PERMIT NO. SSM 129-10709 _____ AFS PLANT ID: 129-00002 _____ AFS POINT ID: _____ INSP: Dave Holder
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: _____

DATE/TIME MALFUNCTION STARTED: ____/____/19____ _____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE ____/____/19____ _____ AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO2, VOC, OTHER: _____

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____

INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

MALFUNCTION REPORTED BY: _____ TITLE: _____
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

**Please note - This form should only be used to report malfunctions
applicable to Rule 326 IAC 1-6 and to qualify for
the exemption under 326 IAC 1-6-4.**

326 IAC 1-6-1 Applicability of rule

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

326 IAC 1-2-39 "Malfunction" definition

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

***Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

Indiana Department of Environmental Management Office of Air Management

Technical Support Document (TSD) for a Significant Source Modification to a Part 70 Operating Permit

Source Background and Description

Source Name:	General Electric Company
Source Location:	One Lexan Lane, Mt. Vernon, IN 47620
County:	Posey
SIC Code:	2821
Operation Permit No.:	SSM129-10709-00002
Permit Reviewer:	Scott Pan/EVP

The Office of Air Management (OAM) has reviewed a significant source modification application from General Electric Company relating to the operation of a plastic sheet coating line.

History

On March 2, 1999, General Electric Company submitted an application to the OAM requesting to add additional surface coating lines to their existing plant. A Part 70 permit application (T129-6794-00002) for the existing source was received on October 6, 1996 and is currently being reviewed by IDEM.

New Emission Units and Pollution Control Equipment

The application includes information relating to the construction and operation of the following equipment:

One (1) plastic sheet coating line, identified as L-16, consisting of one (1) roll coater and one (1) electric cure oven, exhausting through three (3) stack IDs 09-001, 09-002 and 09-106. The volatile organic compounds (VOC) emissions from the plastic sheet coating line will be controlled by four (4) existing boilers (Reiley boiler, Lasker boiler, Erie boiler and B & W boiler).

General Electric Company requested that the coating material used and the raw material usage rates be maintained as confidential information.

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
09-001	Roll Coater & Cure Oven	100	5.42	163,000	350
09-002	Roll Coater & Cure Oven	250	7.50	225,000	400
09-106	Roll Coater & Cure Oven	55	5.67	75,000	300

Recommendation

The staff recommends to the Commissioner that the Significant Source Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on March 2, 1999, additional information was received on April 16, 1999.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (two (2) pages).

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA.”

Pollutant	Potential To Emit (tons/year)
PM	0.0
PM-10	0.0
SO ₂	0.0
VOC	214.8
CO	0.0
NO _x	0.0

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential To Emit (tons/year)
Glycol Ethers	44.8
1,4 Dioxane	0.0
Formaldehyde	0.0
TOTAL	44.8

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of VOC is equal to or greater than 25 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

- (b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (c) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

County Attainment Status

The source is located in Posey County.

Pollutant	Status
PM-10	attainment
SO ₂	attainment
NO ₂	attainment
Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Posey County has been designated as attainment or unclassifiable for ozone.

Source Status

Existing Source PSD, Part 70 or FESOP Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/ or as otherwise limited):

Pollutant	Potential to Emit (tons/year)
PM	523
PM-10	481
SO ₂	26,746
VOC	2,482
CO	1,145
NO _x	7,837

- (a) This existing source is a major stationary source because at least one attainment regulated pollutant is emitted at a rate of 250 tons per year.
- (b) These emissions were based on the OAM AIRS Facility Quick Look Report, date January 21, 1999.

Proposed Modification

PTE from the proposed modification (based on 8,760 hours of operation per year at rated capacity including enforceable emission control and production limit, where applicable):

Pollutant	PM (ton/yr)	PM10 (ton/yr)	SO ₂ (ton/yr)	VOC (ton/yr)	CO (ton/yr)	NO _x (ton/yr)
Proposed Modification	0.0	0.0	0.0	10.7	0.0	0.0
Contemporaneous Increases	NA	NA	NA	NA	NA	NA
Contemporaneous Decreases	NA	NA	NA	NA	NA	NA
Net Emissions	0.0	0.0	0.0	10.7	0.0	0.0
PSD or Offset Significant Level	25	15	40	40	100	40

- (a) This modification to an existing major stationary source is not major because the emissions increase is less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source has submitted their Part 70 (T129-6794-00002) application on October 6, 1996. The equipment being reviewed under this permit shall be incorporated in the submitted Part 70 application.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR part 63) applicable to this source.

State Rule Applicability - Entire Source

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year of PM, PM-10, SO₂, VOC, CO and NO₂. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 2-4.1-1 (New Source Toxics Control)

326 IAC 2-4.1-1 applies to the construction or reconstruction of major source for HAP, as defined in 40 CFR 63.41. The proposed coating line has potential emissions of any single HAP equal or greater than ten (10) tons per year and potential emissions of a combination of HAPs greater than or equal to twenty-five (25) tons per year and is subject to the requirements of 326 IAC 2-4.1-1. The HAP emissions shall be controlled by four (4) existing boilers each with a minimum overall destruction efficiency (including capture and removal efficiencies) of 95% which is considered to be best available control technology (BACT) by IDEM. The potential to emit of single HAP and total HAPs from the proposed coating line shall be less than 10 and 25 tons per year, respectively. Therefore, the requirements of 326 IAC 2-4.1-1 do not apply.

326 IAC 2-2 (Prevention of Significant Deterioration)

The existing source is a major PSD source. Therefore, any modification to this source which has the potential to emit of any of the criteria pollutants greater than the major modification thresholds, would be subject to the requirements of 326 IAC 2-2. The potential to emit VOC from the proposed modification will be controlled to below 40 tons per year. Therefore, the proposed modification is not subject to the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration).

326 IAC 8-1-6 (New Facilities, General Reduction Requirements)

326 IAC 8-1-6 applies to new facilities which have potential emissions of 25 tons or more per year of VOC and are not otherwise regulated by other provision of article 8 (326 IAC 8). The uncontrolled potential VOC emissions from the proposed plastic sheet coating line are greater than the twenty-five (25) tons per year applicability threshold. Therefore, the proposed modification is subject to the requirements of 326 IAC 8-1-6. The VOC emissions from the proposed plastic sheet coating line will be controlled by four (4) existing boilers each with a minimum overall control efficiency of 95% including capture and removal efficiencies. The OAM has determined that the use of the four (4) existing boilers, each with a minimum of 95% overall control efficiency to control VOC emissions, satisfies the requirements of 326 IAC 8-1-6.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

1. The proposed plastic sheet coating line has applicable compliance monitoring conditions as specified below:

- (a) The combustion zone temperatures of the four (4) boilers (Reiley boiler, Lasker boiler, Erie boiler, B & W boiler) controlling VOC and HAP emissions shall be maintained at a minimum of 2800⁰F, 2600⁰F, 2600⁰F and 2800⁰F, respectively.

These monitoring conditions are necessary because the boilers for VOC and HAP control must operate properly to ensure compliance with 326 IAC 8-1-6 (New Facilities, General Reduction Requirements) and 326 IAC 2-7 (Part 70).

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 188 hazardous air pollutants (HAPs) set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Part 70 Application Form GSD-08.

- (a) This source will emit levels of air toxics less than those which constitute a major source according to Section 112 of the 1990 Clean Air Act Amendments.
- (b) See attached calculations for detailed air toxic calculations. (page 2 of 2 in Appendix A)

Conclusion

The operation of this proposed plastic sheet coating line shall be subject to the conditions of the attached proposed **SSM 129-10709-00002**.

**Indiana Department of Environmental Management
Office of Air Management**

Addendum to the
Technical Support Document for a Significant Source Modification to a Part 70
Operating Permit

Source Name:	General Electric Company
Source Location:	One Lexan Lane, Mt. Vernon, IN 47620
County:	Posey
Construction Permit No.:	SSM 129-10709-00002
SIC Code:	2821
Permit Reviewer:	Scott Pan/EVP

On June 9, 1999, the Office of Air Management (OAM) had a notice published in the Mount Vernon Democrat, Mt. Vernon, Indiana, stating that General Electric Company had applied for a significant source modification relating to the construction and operation of a plastic sheet coating line with control. The notice also stated that OAM proposed to issue a permit for this installation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On July 9, 1999, General Electric Company (GE) submitted comments on the proposed construction permit. The summary of the comments and corresponding responses is as follows:

Comment #1:

Since the proposed permit covers both the new Line 16 coating process and the four (4) existing boilers which will be modified as VOC control devices for Line 16, GE requests that the wording "modify" be included in the first sentence on the cover page.

Response #1:

The first sentence on the cover page has been revised as follows:

(herein known as the Permittee) is hereby authorized to construct, **modify** and operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this approval.

Comment #2:

The rules do not require that the name of the responsible official be stated in the SSM. Furthermore, since more than one person can be a "responsible official", it doesn't make sense to list only one person. Historically, the person in this position at GE's Mt. Vernon plant has changed every two to three years. GE believes listing the name of the responsible official in the SSM has no legal authority and serves no useful purpose. Therefore, GE requests that the line listing the responsible official be removed.

Response #2:

As a source subject to the requirements of a Part 70 Permit, GE must provide the OAM with the name(s) of "Responsible Official(s)", as defined in 326 IAC 2-7-1(34), to be responsible for the accuracy of all the information provided in any application related to Part 70 permit, as well as responsible for assuring all the conditions required by the permit be met and all required reports/certifications be prepared properly. It is the Permittee's responsibility to notify the OAM whenever the name(s) of the registered "Responsible Official(s)" has been changed. However, since the source has not yet been issued a Part 70 permit, OAM decided the listing of "Responsible Official" for this SSM is not required and has removed the listing of "Responsible Official" as requested.

Comment #3:

GE requests that the first two (2) paragraphs of Section A.2 be revised as follows to better describe this significant source modification:

This stationary source is approved to construct, **modify** and operate the following emission units and pollution control devices:

One (1) plastic sheet coating line, identified as L-16, consisting of one (1) roll coater and one (1) electric cure oven, exhausting through three (3) stack IDs 09-001, 09-002 and 09-106. The volatile organic compounds (VOC) emissions from the plastic sheet coating line will be controlled by four (4) existing boilers (~~Riley~~ **Riley boiler (S/V 09-106)**, Lasker boiler (**S/V 09-002**), Erie boiler (**S/V 09-002**) and B & W boiler (**S/V 09-001**)).

Currently, the Riley and Erie boilers are used to control VOC emissions from emission units in the building where L-16 will be located. Piping will be added to allow the VOC emissions from L-16 to be controlled by the Erie and Riley boilers. As part of this modification, piping will be added to allow the VOC emissions from L-16 and other emission units in the same building to be also controlled by the Lasker and B & W boilers.

Response #3:

OAM agrees with the request and has revised Section A.2 of the proposed permit accordingly. Additionally, same changes were made to the equipment list of Section D.1.

Comment #4:

The condition B.5 (d) of the proposed permit requires the Permittee, i.e. GE, to receive the Operation Permit Validation Letter, even though GE lacks any power to cause the letter to be sent. The permit should only require the GE to do something within GE's power, i.e., attach whatever letters GE does receive from IDEM. GE requests that the language in this condition be revised as follows:

- (d) The Permittee shall ~~receive an~~ **attach to this document each** Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section ~~and attach it to this document.~~

Response #4:

It is the responsibility of the Chief of the Permit Administration & Development Section to provide the Permittee with an Operation Permit Validation Letter. Condition B.5(d) is only stating what is going to happen. Therefore, no change was made due to this comment.

Comment #5:

Conditions (a), (b) and (c) in the second half of Condition B.5 indicate that the Permittee's right to operate approval won't be effective until the applicable "procedure" (a), (b) or (c) is followed. There is no authority in the rules to delay the effectiveness of the approval in this manner. Also, Condition B.3, which is based on IC 13-15-5-3, says the approval is effective upon issuance. These additional procedures conflict with B.3. Furthermore, this provision conflicts with 326 IAC 2-7-10.5(l). GE requests that Conditions B.5 (a), (b) and (c) be deleted in its entirety.

Response #5:

The Permittee is allowed to request to operate the permitted facilities before or after the issuance of the Part 70 permit being processed at the same time, as long as the proper procedure described in (a), (b) or (c) is followed. Therefore, no change was made due to this comment. However, to avoid confusion, Conditions (a), (b) and (c) in the second half of Condition B.5 have been renumbered as (1), (2) and (3).

Comment #6:

The authority of IDEM to require certification lies only in an applicable requirement. GE request that the language in condition C.1(a) be revised as follows:

- (a) Where ~~specifically designated by this approval or~~ required by an applicable requirement, any application form, report, or compliance certification submitted under this approval shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this approval, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Response #6:

IDEM has authority under 326 IAC 2-7-6 to require the certification specifically designated by this approval or required by an applicable requirement. Therefore, no change was made due to this comment.

Comment #7:

GE requests that Condition C.1(b) be revised as follows:

- (b) One (1) certification shall be included, on the attached Certification Form **or a form substantially similar to it**, with each submittal.

Response #7:

OAM agrees with the request and has made the change to Condition C.1(b) accordingly.

Comment #8:

GE requests that the first paragraph of Condition C.2(a) be revised as follows:

- (a) If required by specific condition(s) in Section D of this approval, the Permittee shall prepare and maintain a Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this approval, including the following information on each facility:

Response #8:

OAM agrees with the request and has made the requested changes.

Comment #9:

GE can not perform compliance monitoring until the equipment to be monitored has been constructed or modified. Thus, the proper trigger of the 90-day period as required in Condition C.7 should be the submission of the applicable affidavit of construction. GE requests that Condition C.7 be revised to reflect the proper trigger of the 90-day period. Also, IDEM lacks the authority to require that the affidavit of construction be certified by a "responsible official" as defined by 326 IAC 2-7-1(34). GE requests that the last paragraph of the Condition C.7 regarding "responsible official" be removed.

Response #9:

OAM has determined that, to operate new equipment, the source must be in compliance with any applicable monitoring requirement from the start of operation. Also, 326 IAC 2-7-6 authorizes OAM to require the affidavit of construction be certified by a "responsible official" as defined by 326 IAC 2-7-1(34). Therefore, no change was made due to this comment.

Comment #10:

IDEM has no authority to require a Compliance Response Plan. GE requests that the languages related to the Compliance Response Plan in Conditions C.8(a)(5), C.8(b), (c), (d), C.13(c)(4) and D.1.7 be removed.

Response #10:

The U.S. EPA's CAM rule supplements the existing federal requirements of 40 CFR 70 and corresponding Indiana authority under 326 IAC 2-7. The CAM rule does not apply to this permit (nor does it apply to the majority of Indiana's initial Part 70 permits) because a completed Part 70 permit application from the source was received prior to this rule. The OAM is continuing to implement Indiana's established approach to compliance monitoring while considering how to address the federal CAM rule through the State rulemaking process. An overview of the established compliance monitoring approach follows.

IDEM has worked with members of the Clean Air Act Advisory Council's Permit Committee, Indiana Manufacturing Association, Indiana Chamber of Commerce and individual applicants regarding the Preventive Maintenance Plan, the Compliance Monitoring Plan and the Compliance Response Plan. IDEM has clarified the preventive maintenance requirements by working with sources on draft language over the past two years. The plans are fully supported by rules promulgated by the Air Pollution Control Board. The plans are the mechanism each permittee will use to verify continuous compliance with its permit and the applicable rules and will form the basis for each permittee's Annual Compliance Certification. Each permittee's ability to verify continuous compliance with its air pollution control requirements is a central goal of the Title V and FESOP permit programs.

The regulatory authority for and the essential elements of a compliance monitoring plan were clarified in IDEM's Compliance Monitoring Guidance, in May 1996. IDEM originally placed all the preventive maintenance requirements in the permit section titled "Preventive Maintenance Plan." Under that section the permittee's Preventive Maintenance Plan (PMP) had to set out requirements for the inspection and maintenance of equipment both on a routine basis and in response to monitoring. Routine maintenance was a set schedule of inspections and maintenance of the equipment. The second was inspection and maintenance in response to monitoring that showed that the equipment was not operating in its normal range. This monitoring would indicate that maintenance was required to prevent the exceedance of an emission limit or other permit requirement. The maintenance plan was to set out the "corrective actions" that the permittee would take in the event an inspection indicated an "out of specification situation", and also set out the time frame for taking the corrective action. In addition, the PMP had to include a schedule for devising additional corrective actions for out of compliance situations that the source had not predicted in the PMP. All these plans, actions and schedules were part of the Preventive Maintenance Plan, with the purpose of maintaining the permittee's equipment so that an exceedance of an emission limit or violation of other permit requirements could be prevented.

After issuing the first draft Title V permits on public notice in July of 1997, IDEM received comments from members of the regulated community regarding many of the draft permit terms, including the PMP requirements. One suggestion was that the corrective action and related schedule requirements be removed from the PMP requirement and placed into some other requirement in the permit. This suggestion was based, in some part, on the desire that a permittee's maintenance staff handle the routine maintenance of the equipment, and a permittee's environmental compliance and engineering staff handle the compliance monitoring and steps taken in reaction to an indication that the facility required maintenance to prevent an environmental problem.

IDEM carefully considered this suggestion and agreed to separate the "corrective actions" and related schedule requirements from the PMP. These requirements were placed into a separate requirement, which IDEM named the Compliance Response Plan (CRP). In response to another comment, IDEM changed the name of the "corrective actions" to "response steps." That is how the present CRP requirements became separated from the PMP requirement, and acquired their distinctive nomenclature.

Other comments sought clarification on whether the failure to follow the PMP was violation of the permit. The concern was that a permittee's PMP might call for the permittee to have, for example, three "widget" replacement parts in inventory. If one widget was taken from inventory for use in maintenance, then the permittee might be in violation of the PMP, since there were no longer three widgets in inventory, as required by the PMP. Comments also expressed a view that if a maintenance employee was unexpectedly delayed in making the inspection under the PMP's schedule, for example by the employee's sudden illness, another permit violation could occur, even though the equipment was still functioning properly.

IDEM considered the comments and revised the PMP requirement so that if the permittee fails to follow its PMP, a permit violation will occur only if the lack of proper maintenance causes or contributes to a violation of any limitation on emissions or potential to emit. This was also the second basis for separating the compliance maintenance response steps from the PMP and placing them in the Compliance Response Plan (CRP). Unlike the PMP, the permittee must conduct the required monitoring and take any response steps as set out in the CRP (unless otherwise excused) or a permit violation will occur.

The Compliance Monitoring Plan is made up of the PMP, the CRP, the compliance monitoring and compliance determination requirements in section D of the permit, and the record keeping and reporting requirements in sections C and D. IDEM decided to list all these requirements under this new name, the Compliance Monitoring Plan (CMP), to distinguish them from the PMP requirements. The section D provisions set out which facilities must comply with the CMP requirement. The authority for the CMP provisions is found at 326 IAC 2-7-5(1), 2-7-5(3), 2-7-5(13), 2-7-6(1), 1-6-3 and 1-6-5.

State and Federal new source review requirements related to limiting potential to emit (PTE) also require conditions that limit the way the source is operated and ensure enforceability as a practical matter. The IDEM considers CRPs as contributing to the fulfillment of these requirements. Therefore, no change was made due to this comment.

Comment #11:

The provisions of 326 IAC 2-7-16 apply to this SSM, as stated in the Condition C.8 (d). 326 IAC 2-7-16 (d) states that the emergency provisions of 326 IAC 2-7-16 supersede 326 IAC 1-6. Therefore, 326 IAC 1-6 should not apply to this SSM and the Condition C.10 (Malfunctions Report [326 IAC 1-6-2]) should be deleted in its entirety.

Response #11:

The superseding of 326 IAC 1-6 by 326 IAC 2-7-16(d) does not take effect until the initial Part 70 permit for the source has been issued. Since the source has not yet been issued a Part 70 permit, 326 IAC 1-6 still applies. Therefore, no change was made due to this comment.

Comment #12:

Consistent with Comment #9, GE can not begin record keeping until the equipment on which record must be kept has been constructed or modified. Thus, the proper trigger of the 90-day period as required in Condition C.13(d) should be the submission of the applicable affidavit of construction. GE requests that Condition C.13(d) be revised to reflect the proper trigger of the 90-day period.

Response #12:

OAM has determined that, to operate new equipment, the source must be in compliance with any applicable monitoring requirement, including recording keeping requirements, from the start of operation. Therefore, no change was made due to this comment.

Comment #13:

GE requests several revisions to the Condition D.1.1 to clarify the following issues:

- (1) The VOC input limit (214.8 tons per year as stated in the proposed Part 70 permit) should exactly equal that stated in the TSD (214.84 tons per year) and must be exceeded for a violation to occur.
- (2) During the first twelve months of operation, the limit is cumulative, not a rolling total.
- (3) The ductwork which carries the captured VOC emissions to the boilers is configured to allow one or any combination of the four boilers to be used as the control device.

Accordingly, GE requests that the language in the Condition D.1.1 be revised as follows:

- (a) Based on the maximum VOC usage rate, the input of VOC to the plastic sheet coating line shall ~~be limited to less than~~ **not exceed** 214.84 tons per **rolling** twelve (12) consecutive month period. During the first twelve (12) months of operation, the input of VOC shall be limited such that the total usage divided by the accumulated months of operation shall ~~be less than~~ **not exceed** 17.90 tons per month, ~~rolled on a monthly basis.~~
- (b) ~~The Control VOC emissions utilizing one or any combination of the four (4) existing boilers (Reiley Riley boiler, Lasker boiler, Erie boiler and B & W boiler) operate at all times that the plastic sheet coating line is in operation and each boiler shall maintain a minimum temperature as described in Condition D.1.7 to maintain with~~ **The Control VOC emissions utilizing one or any combination of the four (4) existing boilers (Reiley Riley boiler, Lasker boiler, Erie boiler and B & W boiler) operate at all times that the plastic sheet coating line is in operation and each boiler shall maintain a minimum temperature as described in Condition D.1.7 to maintain with** a minimum overall control efficiency of 95% including capture and removal efficiencies.

The conditions shall limit controlled VOC emissions to less than 10.74 tons per twelve (12) consecutive month period.

Response #13:

- (1) Due to the concern over potential inaccuracies involved in determining the VOC emissions, OAM decided to round-off the second digit of the emission limits. Because of the rounding-off, the emission limits are set to "be limited to less than".
- (2) "per twelve (12) consecutive month period" has the same meaning as "per rolling twelve (12) consecutive month period."
- (3) Unless the Permittee installs the continuous monitoring equipment with detailed record keeping, it is impossible for OAM to know whether the VOC emissions from the proposed facility are properly controlled.

Based on GE's requests and the above explanations, Condition D.1.1(a) was revised as follows:

- (a) Based on the maximum VOC usage rate, the input of VOC to the plastic sheet coating line shall be limited to less than 214.8 tons per twelve (12) consecutive month period. During the first twelve (12) months of operation, the input of VOC shall be limited such that the total usage divided by the accumulated months of operation shall be less than 17.9 tons per month, ~~rolled on a monthly basis.~~

Comment #14:

Condition D.1.2 references Section B - Preventive Maintenance Plan by mistake. It should be Section C.

Response #14:

Condition D.1.2 has been revised to correct the mistake.

Comment #15:

There is no need to operate a boiler for VOC control unless a VOC based coating is being applied to the plastic sheet. GE requests that the language in Condition D.1.4 be revised to reflect such concern.

Response #15:

OAM agrees and has revised Condition D.1.4 as follows:

The boilers for the VOC control shall be in operation at all times when a **VOC-containing coating is being applied or VOC-containing Solvent is being used in the Line 16** plastic sheet coating facility ~~is in operation~~.

Comment #16:

The combustion zone temperatures for the boilers provided in the Part 70 permit application were incorrect. The minimum temperature listed in Condition D.1.7 should be 1400°F.

Response #16:

Condition D.1.7 has been revised as follows:

D.1.7 Parametric Monitoring

The Permittee shall record the combustion zone temperatures for the four (4) boilers (~~Reiley~~ **Riley** boiler, Lasker boiler, Erie boiler and B & W boiler) controlling the VOC emissions, at least once daily when a **VOC-containing coating is being applied or VOC-containing Solvent is being used in the Line 16** plastic sheet coating process ~~is in operation~~. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the combustion zone temperatures of **each of** the four (4) boilers controlling VOC emissions shall be maintained at a minimum of ~~2800°F, 2600°F, 2600°F and 2800°F~~ **1400°F, respectively**, or at temperatures established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the temperature readings are outside of the above mentioned ranges for any one reading.

Comment #17:

GE requests that the language for the Condition D.1.8 (Record Keeping Requirements) be revised as follows:

D.1.8 Record Keeping Requirements

- (a) To document compliance with Condition D.3.4 **1.1**, the Permittee shall maintain records in accordance with (1) through (6) below. Records ~~maintained for~~ **of the information set forth in** (1) through (6) shall be ~~taken~~ **prepared** monthly and shall be complete and sufficient to establish compliance with the VOC usage limit and/or the VOC emission limit established in Condition D.1.1.
- (1) The amount and VOC content of each coating material and solvent used. Records ~~shall~~ **may** include purchase orders, invoices, and material safety data sheets (MSDS) ~~necessary to~~ **and any other documents that can** verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - (3) The ~~volume-weighted~~ VOC content (**by weight**) of the coatings used for each month;
 - (4) The cleanup solvent usage for each month;

- (5) The VOC usage for each month; and
- (6) The weight of VOCs emitted for each compliance period, **assuming an overall control efficiency (capture and removal combined) of 95% or the overall control efficiency established during the latest stack test.**
- (b) To document compliance with Condition D.1.6 **7**, the Permittee shall **prepare on a monthly basis and** maintain records of the combustion zone temperatures of ~~the four~~ **(4) each** boilers controlling VOC emissions. Records ~~maintained shall be taken daily~~ and shall be complete and sufficient to establish compliance with the ~~VOC emission~~ **minimum boiler combustion zone temperature** limit established in Condition D.1.4 **7**.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Response # 17:

OAM agrees with GE about the revisions requested for D.1.8(a) and has revised D.1.8(a) as requested. However, Condition D.1.7 requires the Permittee to record the boiler combustion temperatures daily and the purpose of recording the boiler combustion temperatures is to assure the compliance of VOC emission limit established in D.1.1. Therefore, Condition D.1.8(b) was not changed due to this comment. However, the condition listed in the first sentence of D.1.8(b) has been changed from D.1.6 to D.1.7.

Comment #18:

GE requests that the revisions to the equipment list stated in Comment #3 be also made to the equipment list on the Page 1 of the Technical Support Document (TSD).

Response #18:

Revisions made in Response #3 are also applicable to the equipment list on the Page 1 of the TSD.

Comment #19:

GE requests that the table listing the stack information under **Stack Summary** on Page 2 of the TSD be revised as follows:

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
09-001	Roll Coater & Cure Oven B & W Boiler*	100	5.42	163,000	350
09-002	Roll Coater & Cure Oven Erie & Lasker Boilers*	250	7.50	225,000	400
09-106	Roll Coater & Cure Oven Riley Boilers*	55	5.67	75,000	300

* The L-16 roll coater and cure oven are vented to these boilers.

Response #19:

Stack Summary on Page 2 of the TSD is revised as GE has requested.

Comment #20:

GE requests that the **Federal Rule Applicability** section on Page 4 of the TSD be revised as follows:

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this ~~source~~ **modification**.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR part 63) applicable to this ~~source~~ **modification**.

Response #20:

OAM agrees with the requests and the **Federal Rule Applicability** section on Page 4 of the TSD is revised as GE has requested.

Comment #21:

GE requests the first paragraph of Item 1.(a) under **Compliance Requirements** on page 6 of the TSD be revised as follows:

- (a) The combustion zone temperatures of ~~the four (4) a~~ boilers (~~Reiley Riley~~ boiler, Lasker boiler, Erie boiler, B & W boiler) controlling VOC and HAP emissions shall be maintained at a minimum of ~~2800°F, 2600°F, 2600°F and 2800°F,~~ **1400°F, respectively. or a temperature established during the latest stack test.**

Response #21:

OAM agrees to revise the Item 1.(a) under **Compliance Requirements** on page 6 of the TSD as follows:

- (a) The combustion zone temperatures of **each of** the four (4) boilers (~~Reiley Riley~~ boiler, Lasker boiler, Erie boiler, B & W boiler) controlling VOC and HAP emissions shall be maintained at a minimum of ~~2800°F, 2600°F, 2600°F and 2800°F,~~ **1400°F, respectively. or a temperature established during the latest stack test.**